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7 *Attorneys for Defendant*
8 *NETFLIX, INC.*

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**

11 LAURI VALJAKKA,

12 *Plaintiff,*

13 v.

14 NETFLIX, INC.,

15 *Defendant.*

Case No. 4:22-cv-01490-JST

**DECLARATION OF SARAH E.
PIEPMEIER IN SUPPORT OF
DEFENDANT NETFLIX, INC.'S
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL
[SUPPLEMENTAL BRIEF REGARDING
EXPENSES AND FEES PURSUANT TO
ECF NO. 324]**

Judge: Hon. Jon S. Tigar

1 I, Sarah Piepmeier, hereby declare:

2 1. I am an attorney with the law firm Perkins Coie LLP, based in San Francisco,
3 California, and lead counsel representing Defendant Netflix, Inc. I have personal knowledge of the
4 facts set forth in this declaration and am competent to testify.

5 2. Pursuant to Civil L.R. 79-5(e), I make this declaration in support of Netflix's
6 Administrative Motion to File Documents Under Seal Pursuant to Civil L.R. 79-5 ("Administrative
7 Motion") to establish that certain documents contain material that discusses confidential business
8 information of Netflix and Perkins Coie LLP.

9 3. Specifically, the sealable portions of the Declaration of Sarah E. Piepmeier in
10 Support of Netflix's Supplemental Brief regarding Expenses and Fees Pursuant to ECF No. 324,
11 and exhibits thereto, include the billing rates of Netflix's outside counsel at Perkins Coie LLP for
12 work performed in this matter (or information that can be used to derive those rates). These
13 confidential billing rates are the product of negotiations between Netflix and Perkins Coie LLP,
14 which I personally conducted on behalf of Perkins Coie LLP, and reflect discounts provided to
15 Netflix below Perkins Coie LLP's standard billing rates.

16 4. Attached hereto is a true and correct copy of the unredacted Declaration of Sarah E.
17 Piepmeier in Support of Netflix's Supplemental Brief regarding Expenses and Fees Pursuant to
18 ECF No. 324, and all exhibits thereto. Netflix seeks permission for only the highlighted portions
19 of that Declaration and supporting exhibits to remain under seal because they reflect information
20 related to the confidential outside counsel billing rates ("Sealable Portions").

21 5. All versions of Perkins Coie LLP's billing records related to work performed on this
22 matter that are being submitted in support of Netflix's Supplemental Brief include redactions to
23 information that is unrelated to Netflix's Supplemental Brief and its present request for attorneys'
24 fees and costs. Many of these entries reflect attorney-client privileged information and/or the
25 substance of work product related to Netflix's ongoing CUVTA claims against Plaintiff Lauri
26 Valjakka, or its eventual claim for attorneys' fees as a prevailing party in this matter.

27 I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true
28 and correct to the best of my knowledge.

1 Executed on September 2, 2025 in San Francisco, California.

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3 /s/ Sarah E. Piepmeier

4 Sarah E. Piepmeier
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